



101 Park Avenue, 17th Floor
New York, NY 10178
☎ 212.878.7900 📠 212.692.0940
www.foxrothschild.com

ANDREW M. J. BERNSTEIN
Direct No: 212.450.9843
Email: abernstein@foxrothschild.com

Granted in part. Pretrial motions on behalf of defendants Jesus Zapata and Brayan Lloret shall be filed by September 20, 2024.
So ordered.
6/27/2024

BY ECF

Honorable J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007



J. PAUL OETKEN
United States District Judge

Re: **USA v. Nunez, et al.**
Case No. 22-cr-293 (JPO)

Dear Judge Oetken:

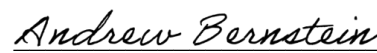
I am CJA-appointed counsel for defendant Jesus Zapata in the above-captioned matter. I write on behalf of defendants Jesus Zapata and Brayan Lloret to request an adjournment of the pre-trial motion schedule as it relates only to Messrs. Zapata and Lloret.

Under the schedule set by Your Honor on March 15, 2024, defense motions are due by June 14, 2024. Messrs. Zapata and Lloret request an additional 120 days until October 14, 2024 to file their motions, with the deadlines for opposition papers and replies likewise adjourned. We have conferred with the government. The government would consent to a 60 day adjournment but opposes an adjournment of 120 days.

The Indictment was originally unsealed in May 2022. The S6 Indictment adding Messrs. Zapata and Lloret was 16 months later in September 2023. So far, the Government has made 19 global productions. By June 14, our clients will have had only nine months to review the more than a terabyte's worth of discovery whereas the other defendants will have had 25 months. While not all the discovery relates to Messrs. Zapata and Lloret, because the Government maintains that each has a leadership role, Ms. Shellow and I are obligated to review a large portion of the conspiracy discovery before deciding on what motions are appropriate for our clients. Plainly put, we have not had enough time to adequately assess the need for pretrial motions practice.

Thank you for your consideration.

Respectfully Submitted,



Andrew M. J. Bernstein

A Pennsylvania Limited Liability Partnership